

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

TENNESSEE STATE CONFERENCE OF  
THE N.A.A.C.P., DEMOCRACY  
NASHVILLE-DEMOCRATIC  
COMMUNITIES, THE EQUITY ALLIANCE,  
and THE ANDREW GOODMAN  
FOUNDATION,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as  
Secretary of State of the State of Tennessee,  
MARK GOINS, in his official capacity as  
Coordinator of Elections for the State of  
Tennessee, HERBERT SLATERY III, in his  
official capacity as Attorney General of the  
State of Tennessee, the STATE ELECTION  
COMMISSION, and DONNA BARRETT,  
JUDY BLACKBURN, GREG DUCKETT,  
MIKE MCDONALD, JIMMY WALLACE,  
TOM WHEELER, and KENT YOUNCE, in  
their official capacities as members of the State  
Election Commission,

Defendants.

Case No. 3:19-cv-00365  
Judge Aleta A. Trauger

**PLAINTIFFS' MOTION FOR LEAVE TO FILE EXCESS PAGES IN THEIR  
MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANTS'  
MOTION TO DISMISS**

Plaintiffs respectfully submit this Motion for Leave to File Excess Pages in Their  
Memorandum of Law in Opposition to Defendants' Motion to Dismiss. In support of this  
Motion, Plaintiffs state:

1. Defendants filed a Memorandum of Law in support of their Motion to Dismiss totaling 20 pages excluding the case caption, signature lines, and certificate of service as per the Middle District of Tennessee Local Rule 7.03(a), arguing multiple issues of law with sub issues delineated under each main issue which, while broadly stated by Defendants, require detailed responses from Plaintiffs.
2. In order to respond fully to Defendants' arguments and to apprise this Court fully of the substantial responses to Defendants' broad assertions, Plaintiffs require a number of pages in excess of this Court's 20-page limitation.
3. Plaintiffs therefore request leave to file a Memorandum of Law in Opposition to Defendants' Motion to Dismiss of not more than 35 pages excluding the case caption, signature lines, and certificate of service as per the Middle District of Tennessee Local Rule 7.03(a). Plaintiffs will endeavor to file a brief whose length is less than that requested.
4. Plaintiffs contacted Defendants on June 16, 2019 to request Defendants' consent for Plaintiffs' request to this Court for excess pages. Plaintiffs have not heard from Defendants.
5. Based on the foregoing, Plaintiffs request that the Court enter the Proposed Order attached hereto as Exhibit A.

Respectfully submitted,

/s/ Taylor A. Cates

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Democratic Communities, the Equity  
Alliance, and the Andrew Goodman  
Foundation*

## **CERTIFICATE OF SERVICE**

I do hereby certify on the 17th day of June 2019, that a true and correct copy of the foregoing document was transmitted via the Court's ECF/CM system to the following:

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Nashville, TN 37243

Greg Duckett, Commissioner  
State Election Commission  
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Judy Blackburn, Commissioner  
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/s/ Taylor A. Cates  
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